

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: JOHNSON & JOHNSON
TALCUM POWDER PRODUCTS
MARKETING, SALES PRACTICES, AND
PRODUCTS LIABILITY LITIGATION

)
) MDL No. 2738
)
) **NOTICE OF MOTION TO SEAL**
) **CERTAIN PORTIONS OF**
) **PLAINTIFFS' STEERING**
) **COMMITTEE'S OBJECTION TO**
) **SPECIAL MASTER'S LETTER**
) **OPINION ON DEFENDANT**
) **IMERYS TALC AMERICA, INC.'S**
) **CLAWBACK REQUEST OF**
) **EMPLOYEE EMAILS**
)

TO: All Counsel of Record

COUNSEL:

PLEASE TAKE NOTICE that on a date that may be determined by the Court, the undersigned, counsel for defendant Imerys Talc America, Inc. ("Defendant"), shall move before the District Court of New Jersey Trenton Division, for an Order sealing certain portions of Plaintiffs' Steering Committee's Objection to Special Master's Letter Opinion on Defendant Imerys Talc America, Inc.'s Clawback Request of Employee Emails.

PLEASE TAKE FURTHER NOTICE that Defendant will rely upon the attached Brief and Certification of Mark K. Silver, Esq. submitted herewith in support of this motion.

PLEASE TAKE FURTHER NOTICE that pursuant to Rule 1:6-2, Defendant hereby requests oral argument in the event that this motion is opposed.

COUGHLIN DUFFY LLP
Attorneys for Defendant Imerys Talc America, Inc.

/s/ Mark K. Silver
Mark K. Silver, Esq.

Dated: December 4, 2018

CERTIFICATION OF SERVICE

I hereby certify that a copy of the foregoing document was filed electronically with the Clerk of the Court using the CM/ECF system and is available for viewing and downloading from the CM/ECF system. The forgoing document was served upon all counsel of record via the CM/ECF system on this 4th day of December, 2018.

COUGHLIN DUFFY LLP

Attorneys for Defendant Imerys Talc America, Inc.

/s/ Mark K. Silver

Mark K. Silver, Esq.